

Pulaski County Special School District v.  
Kiffany Pride, et al.

June 11, 2018

1	PULASKI COUNTY SPECIAL SCHOOL DISTRICT	PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018
2		I N D E X
3	IN THE MATTER OF:	
4	KIFFANY PRIDE	Statement by Mr. Kemp
5	LAURA SHIRLEY	Instructions by the Hearing Officer
6	JENNIFER BEASLEY	Motions by Mr. Walker
7	NICOLE TOWNSEND	WITNESSES
8	The above-entitled matter was heard by the Board of Education, on Monday, June 11, 2018, beginning at 6:07 p.m., in the Board Room of the Administrative Offices, Pulaski County Special School District, 925 East Dixon Road, Little Rock, Pulaski County, Arkansas.	DENISE PALMER
9		Direct by Mr. Bequette
10		Cross by Mr. Walker
11		Examination by the Board
12	BOARD MEMBERS:	PAUL BREWER
13	DR. LINDA REMELE (not present)	Direct by Mr. Bequette
14	SHELBY THOMAS	Cross by Mr. Walker
15	BRIAN MAUNE	LINDA GOODWIN
16	MIKE KEMP	Direct by Mr. Walker
17	ELI KELLER	SHAWN BURGESS
18	TINA WARD	Direct by Mr. Walker
19	ALICIA GILLEN	KIFFANY PRIDE
20	ON BEHALF OF THE DISTRICT:	Direct by Mr. Walker
21	GEORGE 'JAY' BEQUETTE, JR., ESQ. Bequette & Billingsley 425 West Capitol Avenue, Suite 3200 Little Rock, Arkansas 72201	Examination by the board
22	ON BEHALF OF THE EMPLOYEES:	Redirect by Mr. Walker
23	JOHN WALKER, ESQ. Walker Law Firm 1723 Broadway Little Rock, Arkansas 72206	DR. YOLAUNDRA WILLIAMS
24		Direct by Mr. Walker
25		NICOLE THOMPSON
		Direct by Mr. Walker
1	PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018	PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018
2	A P P E A R A N C E S (continued):	Examination by the Hearing Officer
3	HEARING OFFICER:	LAURA SHIRLEY
4	SHARON STREETT, ESQ.	Direct by Mr. Walker
5	ALSO PRESENT:	JENNIFER BEASLEY
6	Dr. Janice Warren	Direct by Mr. Walker
7	Paul Brewer	JO ANN KOHLER
8	Kiffany Pride	Direct by Mr. Walker
9	Laura Shirley	DR. JANICE WARREN
10	Jennifer Beasley	Direct by Mr. Walker
11	Nicole Townsend	Examination by the Hearing Officer
12	Joy Springer	Redirect by Mr. Walker
13	Denise Palmer	Examination by the Board
14	Linda Goodwin	Further redirect by Mr. Walker
15	Shawn Burgess	Re-examination by the Board
16	Dr. Yolaundra Williams	Further redirect by Mr. Walker
17	Jo Ann Kohler	EXHIBITS
18	----o----	DISTRICT
19		KIFFANY PRIDE
20		1 Administrator's Contract for 2017-2018 School Year
21		2 Notice of Non-Renewal from Dr. Janice Warren to Kiffany Pride, dated April 27, 2018
22		3 Reduction in Force Policy
23		4 Certified Administrative Index 2017-
24		
25		



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1 have rehired for '18-'19 school year?

2 **MR. BEQUETTE:** I think that will be a  
3 question for Mr. Brewer, Mr. Maune.

4 **MR. WALKER:** Well, Mr. Brewer -- it's  
5 speculation, he's an interim person, he's  
6 already retired, he has no authority for  
7 determining who would have been --

8 **HEARING OFFICER:** Let's -- let's hear it  
9 from Mr. Brewer -- from Mr. Brewer. They are  
10 calling him as a witness, Mr. Walker.

11 **EXAMINATION OF PAUL BREWER**  
12 **BY MR. BEQUETTE:**

13 Q Please identify your -- yourself for the record and  
14 your position in the district.

15 A I'm Paul Brewer, Interim CFO -- CEO of the Human  
16 Resources Department.

17 Q And, Mr. Brewer, this Spring, did you -- did you  
18 engage in the process of identifying some cost savings  
19 that could be done by either reducing the number of  
20 licensed staff and classified staff or changing contracts  
21 to reach or accrue savings?

22 A Let me clarify. In April school board meeting I  
23 presented the allocations for the following school year,  
24 '18-'19. And the Board took a look at those and asked  
25 me, and I assumed with Dr. Warren, directed us to: One,

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1 found out -- I guess it was at the Tuesday meeting --  
2 found out Thursday, I guess, sometime that Dr. Warren  
3 would not be back until the following Tuesday. I didn't  
4 feel like I could wait that long to contact Dr. McNulty,  
5 so I called Dr. Remele, got his phone number, introduced  
6 myself, told him the task that he -- that the Board had  
7 asked us to work on. He appreciated that.

8 And so it certainly wasn't pointed at any  
9 individuals. Let me make sure the record stands  
10 straight, I never discussed with Ms. Gillen ever about  
11 any specific cuts to anybody in this district. That's  
12 never been discussed.

13 I did discuss it with Dr. Remele.

14 I talked to Dr. Tackett -- I know he's not here,  
15 but -- and I did talk to Will Reid because they were kind  
16 of heading up this -- I was not a part of that, don't  
17 know a lot about it, the School of Innovation, that maybe  
18 some ways that we need to look at in the future to maybe  
19 restructure some things. I don't know if they ever  
20 talked to Dr. McNulty or not; they never gave me that  
21 information and I didn't ask him.

22 In taking a look at the Central Office staff, what  
23 Dr. McNulty wanted to do was take a look at what we had  
24 in place now and how he might could restructure that and  
25 restructure some of the job descriptions to fit maybe

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1 contact the new Superintendent that will be starting in  
2 July to get -- make sure that he knew kind of we were  
3 looking at reductions in -- in the Central Office; that  
4 was directed the Central Office. I did not say --

5 We knew attrition would take place, as it always  
6 does, I believe around 20 teachers, which would be close  
7 to a million dollars.

8 If you can hire non-tenured teachers who maybe had  
9 30-40 years of experience and hire in new teachers with  
10 bachelor's degrees, it's a substantial savings to the  
11 district, which is what we try to do. It's never a  
12 perfect world but that's what we try to do.

13 At that meeting, I believe, Dr. Remele, along with  
14 other members of the Board, asked us to go back and look  
15 at the Central Office and see what cuts, if any, could be  
16 made, and to make sure that we included Dr. McNulty, who  
17 would be the new Superintendent, prior to making any kind  
18 of recommendations.

19 I did that.

20 Dr. Warren, unfortunately, lost a family member the  
21 following day, had to be out. She was out the following  
22 day. I knew I had about a week to get this done, along  
23 with her, hopefully.

24 I did not have Mr. McNulty's phone number. I called  
25 Dr. Remele and asked her if she had his number, because I

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1 what he wanted to do. But I explained to him, because of  
2 the May 1st deadline, that people would be  
3 automatically renewed and he would not have that  
4 opportunity if we waited until he got here. The people  
5 would be in place, their jobs would be as it stood, as it  
6 was last year.

7 He said that, "I would like to non-renew those  
8 people, interview them myself, take a look at what we  
9 have and bring in what we want to do." My understanding  
10 is he did talk to them, was very impressed with them, as  
11 I've always been. Very, very capable people and they are  
12 all, I consider, good colleagues of mine and friends.

13 The first person I cut was myself, because I didn't  
14 plan on coming next year.

15 **THE WITNESS:** And let me set the record  
16 real, real straight, John. Nobody has offered  
17 me a job in this district next year, because  
18 nobody here except the Superintendent can  
19 recommend that and the Superintendent won't be  
20 here until July 1.

21 I do plan to resign. I already resigned.  
22 I got a letter just like these ladies did.  
23 Mine just said I don't have a job.

24 Now, if the district would like for me to  
25 stay, that would be up to Dr. McNulty and this

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BREWER; NICOLE TOWNSEND, 06/11/2018</p> <p>1 Board come July 1. I've been offered other 2 jobs in other districts. Wanted to know if I 3 would work another year. I said I hadn't made 4 up my mind yet. 5 So -- and I do appreciate the \$180,000 6 salary, that would be a good increase. I would 7 appreciate that as well. 8 <b>HEARING OFFICER:</b> Are you saying that's 9 not your salary, Mr. Brewer? 10 <b>THE WITNESS:</b> My salary is 129,000 plus 11 benefits to be 169. 12 <b>HEARING OFFICER:</b> Thank you. 13 <b>THE WITNESS:</b> Salary next year, if I did 14 stay in the position I'm in, would be \$11,000 15 cut in pay. 16 I came back to the Board with the 17 presentation that Dr. McNulty and I talked 18 about. 19 Can you hand me that water, Jay? That 20 taco salad is getting to me. 21 I came back to the Board and looked at 22 ways we could consolidate some jobs. What 23 Dr. McNulty said he would like to do is take 24 the secondary principals himself, not have a 25 secondary director; that cuts that position</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BREWER; NICOLE TOWNSEND, 06/11/2018</p> <p>1 Ms. Laura, the Gifted and Talented, because I 2 knew she had had the most seniority, to keep 3 her salary at 12 months and leave it the same 4 if she would take on that job. She chose not 5 to. 6 I offered it to the next person in line, 7 who was Jo Ann Kohler, and she accepted that 8 position. So the cost savings with that, just 9 doing away with the coordinator of ELL, was a 10 savings of about \$80,000. 11 We did away with the -- well, I've already 12 said that. 13 Altogether, if you cut these jobs -- but 14 my understanding when I did make the 15 presentation, that Dr. McNulty did plan on 16 hiring back at least some if not all of these 17 coordinators, administrators, and he planned to 18 interview them when he comes back the last week 19 of June. That was my understanding. That's 20 the last discussion I've had with him. 21 Substantial savings, yes. Would some have 22 to be put back, obviously that's what he wants 23 to do if he gets permission from the Board to 24 do so. 25 These positions are not allocated, but</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BREWER; NICOLE TOWNSEND, 06/11/2018</p> <p>1 out, substantial savings. Also he planned to 2 not -- he planned to rehire a Deputy 3 Superintendent that would strictly be over the 4 elementary principals, oversee all of the 5 elementary; he would oversee the secondaries. 6 I did explain to him at that time I think 7 that's a big task for a Superintendent to take 8 on, but he said that's what he wanted to do, 9 and who am I to argue. 10 So we looked at cutting salaries. Looked 11 at our Director of Gifted and Talented and our 12 Athletic Director. They, like a lot of our 13 coaches work, they will work 11 months and 14 actually be on the clock 12; that's the way 15 most people are that work 11 months, but they 16 all have responsibilities throughout the 17 summer, but it was a cost savings; not a 18 popular, by the way. And this certainly can't 19 be done on popularity. I would rather give 20 them all a raise rather than cut their jobs. 21 The Coordinator of our ESL, English as a 22 Second Language, we thought we could 23 consolidate that position in with one of the 24 other jobs that was being cut and reduced to an 25 11-month job. I first offered that to</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BREWER; NICOLE TOWNSEND, 06/11/2018</p> <p>1 they could be added back if the Board chose to. 2 I hope I answered your question. 3 <b>BY MR. BEQUETTE:</b> 4 Q I think you did, Mr. Brewer. Can I ask you another 5 one? 6 A <b>I won't take as long.</b> 7 Q Okay. So do you have the exhibit list and packet 8 for Laura Shirley? 9 A <b>Probably, if you gave it to me.</b> 10 Q I did. 11 A <b>What -- is that No. 1?</b> 12 Q Here you go. 13 A <b>What -- what exhibit is it?</b> 14 Q Okay. So it's Exhibit 2 on Page 3. 15 A <b>Okay.</b> 16 Q And do you recognize this as the notice of a 17 recommended -- recommended partial nonrenewal of Ms. -- 18 Dr. Shirley's contact? 19 A <b>It is.</b> 20 Q And is Reason No. 1 in this letter true? 21 A <b>Yes.</b> 22 Q And was Dr. Shirley the only person who had her 23 contract days reduced? 24 A <b>No.</b> 25 Q Okay. Then let's turn to the -- the exhibit packet</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 for Jennifer Beasley. Turn to Exhibit 2 on Page 3.      2 A Okay.      3 Q Ms. Beasley is a program administrator; correct?      4 A Yes.      5 Q And Ms. Beasley's contract is being non-renewed for      6 the 2018-2019 school year; correct?      7 A Yes, correct.      8 Q Is Reason No. 1 in Exhibit 2 on Page 3 true?      9 HEARING OFFICER: Exhibit 3 -- I mean, on      10 Page 3?      11 BY MR. BEQUETTE:      12 Q Exhibit 2 on Page 3 in Beasley exhibit packet.      13 A Now, I'm not going to put a fly in the ointment.      14 I'm just going to say that is true, not totally true,      15 because there is a chance that some of these might      16 possibly be brought back. This is true.      17 Q Okay. It's true as of right now?      18 A I can't forecast what Dr. McNulty might do.      19 Q But is it true as of today?      20 A As of today it's true.      21 Q Okay. Now then, turn to the exhibit packet for      22 Nicole Townsend. Here you go, Mr. Brewer.      23 A All right.      24 Q Turn to Exhibit 2 on Page 3.      25 A Okay.</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 A Yes.      2 MR. BEQUETTE: Okay. Pass the witness.      3 EXAMINATION OF PAUL BREWER      4 BY MR. WALKER:      5 Q Now, Mr. Brewer, we've known each other for about 25      6 years or more; right?      7 A Yeah. Thirty, I would think.      8 HEARING OFFICER: Mr. Walker, would you      9 speak up just a little bit?      10 THE WITNESS: We've been knowing each      11 other for about 30 years.      12 HEARING OFFICER: No, I meant Mr. Walker.      13 BY MR. WALKER:      14 Q You retired -- you retired from Camden-Fairview?      15 A Yes, sir.      16 HEARING OFFICER: We can't hear you,      17 Mr. Walker.      18 MR. WALKER: I'll speak up.      19 HEARING OFFICER: Thank you.      20 MR. WALKER: I don't have a microphone      21 here. I'll do my best.      22 BY MR. WALKER:      23 Q You retired with your highest salary being \$75,000?      24 A Yeah, about 80,000, I think, John, by the time --      25 Q And then you came here in the Pulaski County School</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 Q Is Ms. Townsend also a program administrator whose      2 contract is being non-renewed for the 2018-2019 school      3 year?      4 A It is.      5 Q And is Reason No. 1 on Exhibit 2, Page 3, true?      6 A Yes.      7 Q And I'm going to hand you the exhibit packet for      8 Ms. -- Ms. Kiffany Pride.      9 A Okay.      10 Q Please turn to Exhibit 2 on Page 3. Ms. Pride is      11 also a program administrator; correct?      12 A Yes.      13 Q And the recommendation was that her contract be      14 non-renewed for the 2018-2019 school year; is that      15 correct?      16 A Yes.      17 Q And is Reason No. 1 in Exhibit 2 on Page 3 true?      18 A Yes.      19 Q And so the letters for Ms. Beasley, Ms. Pride, and      20 Ms. Townsend are the same because they were all three      21 program administrators and their employment contracts      22 were being recommended for nonrenewal for next school      23 year in order to meet the district's needs to reduce      24 expenditures and to match available revenue and to more      25 efficiently manage district resources; correct?</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 District and forced a salary of 120,000?      2 A 129.      3 Q Although you were retired at --      4 A 129 --      5 Q 129, and they forced it on you?      6 A They forced it.      7 Q And they gave you an interim contract; is that      8 right?      9 A That's correct.      10 Q And that's been interim all these years; hasn't it?      11 A That's correct.      12 Q And could you explain to me why this Board never      13 considered you as a permanent employee?      14 A This Board probably did expect me to be a permanent      15 employee.      16 Q This one but not the last one?      17 A I don't know.      18 Q Why this Board?      19 A I don't know that this Board -- I made -- I made      20 sure, and I'll --      21 Q You said this Board did, probably. So why?      22 A This -- this Board was made very well assured -- I      23 assured them that I --      24 MR. BEQUETTE: This is irrelevant to the      25 reasons we're here on today.</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p><b>HEARING OFFICER:</b> I totally agree, but you have to object for me to rule on it.</p> <p><b>MR. BEQUETTE:</b> Pardon?</p> <p><b>HEARING OFFICER:</b> You have to object.</p> <p><b>MR. BEQUETTE:</b> I am objecting. This relates to questions -- this line of questions --</p> <p><b>MR. WALKER:</b> Ms. Streett -- Ms. Streett, this is a matter about cutting budgets, and we're talking about necessity --</p> <p><b>HEARING OFFICER:</b> Okay. Okay. Mr. Walker, I don't think it matters --</p> <p><b>MR. WALKER:</b> And we're talking about somebody who is just given a job, after he retires, for \$50,000 more than he ever made and he's doing nothing and he's interim all the time. What is that other than, per se, waste?</p> <p><b>HEARING OFFICER:</b> It's not relevant to what you're here for, Mr. Walker --</p> <p><b>MR. WALKER:</b> Well, it is because you're talking about budget cuts --</p> <p><b>HEARING OFFICER:</b> So you're saying they should have gotten rid of him instead of them?</p> <p><b>MR. WALKER:</b> They shouldn't have hired him in the first place, and they are required --</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 Q Anybody else?</p> <p>2 A No.</p> <p>3 Well, I won't say they are not friends. They are not friends, like we don't go to Walmart together and drink Cokes or anything, but --</p> <p>6 Q And now let me ask you this: On the issue of your responsibility in the past, did you ever develop budget cuts before this Board was -- was returned?</p> <p>9 A We've cut the budget --</p> <p>10 Q No. Did you --</p> <p>11 A -- every year --</p> <p>12 Q No. Did you, Paul Brewer, ever do so?</p> <p>13 A I've never -- I don't have the power to cut the budget.</p> <p>15 Q That's right.</p> <p>16 Did you ever make recommendations that were presented to Mr. Johnny Key, before this Board came back, that were over your name for budget cuts?</p> <p>19 A No. I -- I presented them to Dr. Guess and he presented them to Dr. Key.</p> <p>21 Q Dr. Guess was the one who made any recommendation for budget cuts; right?</p> <p>23 A Well, he had me do it, but I had to turn around -- he had me do it, yes. I get your point.</p> <p>25 Q And then you had Ms. Burgess do it?</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p><b>HEARING OFFICER:</b> Well, he just got through saying -- well, Mr. Walker that happened years ago.</p> <p><b>MR. WALKER:</b> No, no. It wasn't. Just five years ago.</p> <p><b>HEARING OFFICER:</b> It's years ago from here.</p> <p><b>THE WITNESS:</b> It was nine years.</p> <p><b>MR. WALKER:</b> Oh, nine years?</p> <p>Okay. Well, then, you're doing very well than --</p> <p><b>HEARING OFFICER:</b> Let's move on, Mr. Walker. I don't think this is relevant.</p> <p><b>THE WITNESS:</b> Well --</p> <p><b>HEARING OFFICER:</b> We all know that Mr. Brewer is making a lot of money compared to other people sometimes.</p> <p><b>BY MR. WALKER:</b></p> <p>Q All right. Mr. Brewer, let me just come back to you. Are you friends with any of the board members?</p> <p>A Am I friends with any of them?</p> <p>Q Are you personal friends with any of the board members?</p> <p>A Probably Dr. Remele to some degree, because we've worked together here for several years.</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 A Ms. Burgess and I work very closely together, but she handles most of the teaching center. She also works with the other administrators, but she has not worked with me on this project because of the instruction I was given that Dr. McNulty be involved, I did not include --</p> <p>6 Q Do you recall --</p> <p>7 <b>COURT REPORTER:</b> I can't hear you,</p> <p>8 Mr. Brewer.</p> <p>9 <b>THE WITNESS:</b> I'm sorry.</p> <p>10 I did not include Shawn Burgess in this decision because of the direction that I was given to work through Dr. McNulty, so she was not involved.</p> <p>14 <b>BY MR. WALKER:</b></p> <p>15 Q And you're saying this Board told you to work through Mr. McNulty -- Dr. McNulty?</p> <p>17 A Said for me to give him a call and make sure he was aware of what we were doing and keeping him abreast of the things we were looking at cutting.</p> <p>20 Q I can look for a board minute that said that. Have you seen such a board minute?</p> <p>22 A I -- I hadn't.</p> <p>23 Says what?</p> <p>24 Q That says what you said, that you are supposed to have Dr. McNulty involved in these decisions. Is there</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 any board minute that says that?</p> <p>2 A I don't know.</p> <p>3 Q All right. Now, with respect to the Board, you said 4 the Board directed you to make these cuts?</p> <p>5 A I assumed it was me and Dr. Warren both.</p> <p>6 Q Just a moment, listen to what I said. Let me talk. 7 Did you say that the Board directed you to do it?</p> <p>8 A I took it the Board meant for me and Dr. Warren to 9 both take a look at cuts. Dr. Warren was not here; I 10 felt like I couldn't get it done in one day, so I went 11 ahead and talked to Dr. McNulty. I didn't have his 12 number. I called Dr. Remele to get his phone number.</p> <p>13 Q Just answer my question.</p> <p>14 A I'm trying to answer it.</p> <p>15 Q My question was did you state that the Board 16 directed you to make these cuts?</p> <p>17 HEARING OFFICER: He's already --</p> <p>18 THE WITNESS: I didn't -- I didn't say it, 19 but they actually did.</p> <p>20 BY MR. WALKER:</p> <p>21 Q All right. Now, was Dr. Warren present at the 22 meeting where they asked you to do it?</p> <p>23 A She was.</p> <p>24 Q I see.</p> <p>25 Did they -- did she tell them that she couldn't</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 Did you send him any documents setting out what you 2 were doing?</p> <p>3 A Sent him job descriptions. He wrote back and took a 4 look at the job descriptions and what changes he might 5 want to make to them.</p> <p>6 Q Do you recall we've asked you for all the documents 7 between you and McNulty? Did you provide those to us?</p> <p>8 A I didn't know you asked for them.</p> <p>9 Q I asked for everything.</p> <p>10 A I could give you the job description. I didn't know 11 that you asked for them.</p> <p>12 Q We have the job description.</p> <p>13 A Yes. All right.</p> <p>14 Q You said he wrote you back? Do you have any other 15 communication that you --</p> <p>16 A He didn't write me back. He sent back through a fax 17 that he reviewed and made notes on there of the changes 18 he wanted to make on the job descriptions.</p> <p>19 Q I see.</p> <p>20 Now, did you -- did, to your knowledge, Dr. Warren 21 talk to Dr. McNulty?</p> <p>22 A I would assume she has. I don't --</p> <p>23 Q Has she talked to him with you present?</p> <p>24 A I don't think so.</p> <p>25 Q All right.</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 do it?</p> <p>2 A I didn't hear her say she couldn't do it.</p> <p>3 Q Did you have any discussion with her at all 4 regarding any cuts? Yes or no?</p> <p>5 A After she got back the following week.</p> <p>6 Q Did you before she left?</p> <p>7 A No. I did not.</p> <p>8 Q After the board meeting the next day, did you talk 9 to her about it?</p> <p>10 A No. She was not here.</p> <p>11 Q Okay. Tell me this, did you develop any written 12 standards for cuts?</p> <p>13 A No.</p> <p>14 Q All right. Did you have any documents on which you 15 relied for determining how much and how many you would 16 cut?</p> <p>17 A No.</p> <p>18 Q So it was arbitrary on your part?</p> <p>19 A Arbitrary on whatever cuts we could handle, however 20 Dr. McNulty wanted to do it.</p> <p>21 Q I see.</p> <p>22 Now, did you have any -- anything in writing from 23 Dr. McNulty saying what he wanted?</p> <p>24 A I do not.</p> <p>25 Q I see.</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 A I don't recall it if she did.</p> <p>2 Q Now, Mr. Brewer, you know that you have a RIF 3 policy; right?</p> <p>4 A We do.</p> <p>5 Q And on the allocations there is a form that says -- 6 on the form -- there is a form that says, allocations of 7 freeze; is that correct?</p> <p>8 A No.</p> <p>9 Well, some positions are frozen. All the positions 10 in any hiring down here is frozen. We were instructed 11 that there would be no -- there would be a -- I think the 12 Board minutes read that there is a temporary hiring 13 freeze for the Central Office between now and when 14 Dr. McNulty gets here.</p> <p>15 MR. WALKER: I would like to -- I would 16 like to have these passed out -- can you do 17 it -- to the board members.</p> <p>18 HEARING OFFICER: Just go right ahead and 19 pass them out.</p> <p>20 MR. WALKER: I'll let them be passed. I 21 don't want to slip and fall.</p> <p>22 HEARING OFFICER: John, there's not enough 23 of these. We need two more.</p> <p>24 MR. WALKER: Mr. Bequette, would you be 25 kind enough to share yours with this witness?</p>

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1 <b>THE WITNESS:</b> What have you got?	1   it a true RIF or an untrue RIF, if there is such a thing?
2 <b>MR. BEQUETTE:</b> I don't know.	2 <b>A If it said -- if it says on the allocation true --</b>
3 <b>THE WITNESS:</b> Oh, well --	3   "RIF delete," that means the job was non-renewed and that
4 <b>BY MR. WALKER:</b>	4 <b>job was deleted from all allocations.</b>
5   Q   All right. Mr. Brewer, I'm going to go over these	5   Q   Well, there is nothing in your policy that says
6   exhibits with you.	6   that, though; is there?
7 <b>A Okay.</b>	7 <b>A No.</b>
8   Q   Are you familiar with exhibit, which is marked at	8   Q   Here are the allocations -- do you have the
9   the top, one, Powers and Duties of the Board?	9   allocation?
10 <b>A I would say I'm somewhat familiar, as long as I've</b>	10 <b>A No.</b>
11 <b>been in the school district. Powers and Duties of the</b>	11 <b>Q All right. This is -- let me make sure we -- you</b>
12 <b>Board.</b>	12 <b>don't think I'm deceiving you.</b>
13   Q   Can you tell -- can you tell me what this document	13 <b>A No. I know what it said. I can tell you.</b>
14   is? 1.7?	14   Q   All right. Call your attention to the allocations.
15 <b>A It's the Powers and Duties of the Board; legal</b>	15 <b>HEARING OFFICER:</b> Are you showing him
16 <b>references, it gives that. I don't know if it's from a</b>	16   something that the record needs to know what it
17 <b>school board association. I'm not really sure where it</b>	17   is?
18 <b>came from.</b>	18 <b>THE WITNESS:</b> He's showing me a copy of
19   Q   It's also in your policy. Isn't it?	19   the allocations we're using for a question
20 <b>A It is.</b>	20   here.
21   Q   All right. The next page is 1.31. That's another	21   All of our RIFs -- all of your --
22   one of your policies. Isn't it?	22 <b>HEARING OFFICER:</b> Well, Mr. Walker, do you
23 <b>A I'll take your word for it. I don't have anything</b>	23   have that in your exhibits?
24 <b>in front of me.</b>	24 <b>MR. WALKER:</b> Yes, it's in there.
25   Q   Look at the top of the page?	25 <b>HEARING OFFICER:</b> Okay. What number is
PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018	PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018
1 <b>A Yeah. School Board Member Code of Ethics.</b>	1   it?
2   Q   You're aware that under the -- in the blackened	2 <b>MS. WARD:</b> Seventeen.
3   areas, the Board is to "Function as a part of the	3 <b>HEARING OFFICER:</b> Okay.
4   legislative policy making body-not as an administrative	4 <b>BY MR. WALKER:</b>
5   officer." It's to "work through the administrative	5   Q   All right. We have on Page 4 of the allocations,
6   employees of the Board-not over or around them." Can't	6   Director of Elementary Education, RIF, Director of
7   have secret sessions. Are you aware of that?	7   Secondary Education, RIF, and pro --
8 <b>A Sure.</b>	8 <b>A Right.</b>
9 <b>Yes. I'm sorry.</b>	9   Q   You knew that wasn't a RIF. Didn't you?
10   Q   This is the Reduction in Force Policy?	10 <b>A Yes.</b>
11 <b>A This is the what?</b>	11   Q   Because you knew you had already received a
12   Q   Reduction in Force Policy.	12   resignation of those two people?
13 <b>A Oh, I'm sorry.</b>	13 <b>A It wouldn't have mattered.</b>
14 <b>Yes.</b>	14   Q   Yeah, but you have a RIF --
15   Q   Now, part of your document -- part of your document	15 <b>A We are RIF'ing it -- no, we're not RIF'ing it. We</b>
16   with reductions has in it reduction in force; is that	16   are freezing it, because the Board might want to bring it
17   right?	17   back in the future.
18 <b>A Yes.</b>	18   Q   All right. So it's RIF -- you've got a RIF and a
19   Q   Under your Reduction in Force Policy, isn't it true	19   freeze; right?
20   that if you're going to have a reduction in force policy,	20 <b>A That's correct.</b>
21   that you have to deal with all of the employees and then	21   Q   So RIF and in parenthesis freeze, they mean the same
22   have objective standards before you do so?	22   thing; right?
23 <b>A In the -- in the place of a true RIF, that's true.</b>	23 <b>A Freeze means we're not going to hire them back as a</b>
24   Q   All right. Now, when you had on your certified	24   part of this allocation. It would take Board action and
25   allocations the term "RIF," what did you refer to? Was	25   recommendation of a Superintendent.

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1 Q Now, these program administrators are on Page 6;  
2 isn't that correct?  
3 A That's correct.  
4 Q That source of funding is what?  
5 A NSLA.  
6 Q This budget that Ms. Denise Palmer prepared does not  
7 involve NSLA, does it -- funding, does it?  
8 A I -- I don't know.  
9 Q You don't know? You're the person who made these  
10 decisions.  
11 A About the NSLA?  
12 Q No. No. You're the person who made the  
13 recommendations to the Board. The one-page document.  
14 A Oh, that.  
15 Q It's Exhibit 5.  
16 Now, this -- this says nothing about NSLA. Does it?  
17 A That's correct.  
18 Q Now, how much -- how much money did you save by  
19 cutting these teachers who were being paid out of NSLA?  
20 A Five -- I'm going to say around 500,000.  
21 Q All right. But it didn't come from the operating  
22 budget over here. Did it?  
23 A No, I didn't -- that wasn't part of my thinking. I  
24 was just cutting the -- I was --  
25 Q Now, that -- now, if that money is not spent, what

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1 Q I see.  
2 A Unless he doesn't hire anybody back. If he hires  
3 people back, then you have to subtract it for that  
4 amount.  
5 Q How much of that comes out of NSLA funds?  
6 A None of mine. None of my salary. I'm not paid out  
7 of NSLA funds.  
8 Dr. Tackett, I don't think, is paid out of NSLA  
9 funds.  
10 Q All right. Did you ever have a discussion with  
11 Dr. Warren about how you could -- how you could  
12 effectuate these cuts?  
13 A How I could do what?  
14 Q How the cuts -- how the budget reductions that may  
15 have been desired could have been effectuated? Did you  
16 ever have such a discussion with her?  
17 A We discussed that when she got back.  
18 Q Well, tell me what day was that, sir?  
19 A Tuesday.  
20 Q Was that before the Board meeting?  
21 A The following -- no, the following --  
22 Q Was that before this Board meeting?  
23 A The day before.  
24 Q Did she tell you that she didn't agree with you?  
25 A She did.

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1 happens to it?  
2 You lose it. Don't you?  
3 A I don't think we lose it.  
4 Q You don't?  
5 A I think it's reallocated where you can use some of  
6 the district funds instead of using the NSLA funds.  
7 Q But you don't know that. Do you, Mr. Brewer?  
8 A I've got a pretty good idea. I've been doing it for  
9 20 years.  
10 Q All right. Well, let me ask. If you're going to do  
11 that, if you're going to cut people, why did you  
12 submit -- why did you submit this document through  
13 Ms. Palmer in justification of your cuts when it has  
14 nothing to do with NSLA funds?  
15 A Has to do with saving money.  
16 Q Well, how much money did you set out to save?  
17 A As much as we could and still --  
18 Q How much is that, Mr. Brewer?  
19 A As much as --  
20 Q \$100 or \$10 million? How much was it?  
21 A It ended up -- it ended up being, if we left all the  
22 RIFs as it was, about 1.2 million.  
23 Q If you had? How much was it, Mr. Brewer, in the  
24 final analysis?  
25 A That's about where it is now.

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1 Q Did you tell her why you did it?  
2 A I did.  
3 Q Did she tell you she still didn't agree with it  
4 after you told her?  
5 A She did.  
6 Q All right. Now, you were aware that -- you had  
7 already prepared --  
8 A Now, she didn't disagree with me cutting my salary,  
9 I didn't hear her say that; but she did disagree with the  
10 other.  
11 Q All right. She told you also it wasn't necessary to  
12 reduce the district's budget by \$1 million to cut these  
13 people. Didn't she?  
14 A What Dr. Warren --  
15 Q Didn't she tell you that?  
16 HEARING OFFICER: Let him -- let him  
17 answer, Mr. Walker.  
18 BY MR. WALKER:  
19 Q Go ahead if you want to answer.  
20 A What we discussed was that it would be much better  
21 for him to leave everything in place and then recut it  
22 next year, if he chose to do it or resign. Now,  
23 that's -- that's Administration 101. If you take on a  
24 new job, you don't want to go in there and start changing  
25 things before you get in there, but he wanted a chance to

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEARSE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 have a start of these folks the way he may want to 2 implement his program.</p> <p>3 Q Did you get a call from Dr. McNulty asking you to 4 make budget cuts?</p> <p>5 A No.</p> <p>6 Q So the call that -- that you had with Mr. McNulty -- 7 Dr. McNulty, was generated by this Board. Wasn't it?</p> <p>8 A I was directed to make sure he was included.</p> <p>9 Q I see.</p> <p>10 Now, did this Board ever tell you how much in cuts 11 you were to effectuate?</p> <p>12 A No.</p> <p>13 Q Well, it could have been a hundred dollars or a 14 thousand dollars?</p> <p>15 A Could have been \$50, could have been 12 million.</p> <p>16 Q I see.</p> <p>17 Now let's go on to the next exhibit.</p> <p>18 A Where are we at?</p> <p>19 Q Under the RIF, under the RIF Policy, the RIF policy 20 says, "The Executive Director" -- this is No. 2 in the 21 RIF policy, "The Executive Director of Human Resources 22 will provide the Superintendent with a list of 23 administrators in the administrative position(s) to be 24 reduced ranked by administrative seniority.</p> <p>25 "The list prepared in item two (2) will be used to</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEARSE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 going to hire; it will say "RIF delete," which means that 2 job disappears.</p> <p>3 Q Oh, so you -- was it necessary -- tell me this: Why 4 was it necessary -- since it wasn't district money, why 5 was it necessary to have the jobs for these program 6 administrators to disappear?</p> <p>7 A So that he could rehire them under a different 8 program. That was his reasoning.</p> <p>9 Q His reasoning?</p> <p>10 A Uh-huh.</p> <p>11 Q Was that in writing anywhere?</p> <p>12 A I hope not. Not that I'm aware of.</p> <p>13 Q Why do you hope not?</p> <p>14 A Well, because it -- it was his philosophy, what he 15 wanted, what I was following direction of the Board.</p> <p>16 THE WITNESS: Can you hear me?</p> <p>17 COURT REPORTER: Yes, sir.</p> <p>18 THE WITNESS: Okay.</p> <p>19 BY MR. WALKER:</p> <p>20 Q You were following the Board -- directions of the 21 Board?</p> <p>22 A To look at cost savings out of Central Office where 23 we could find money to cut savings.</p> <p>24 Q Well, now, the NSLA money doesn't go to any 25 expenditure of the Central Office. Does it?</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEARSE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 identify the person(s) with the least seniority within 2 each administrative position that will be affected by the 3 District's layoff."</p> <p>4 Now, did you -- did you provide such a list?</p> <p>5 A We have such a list and --</p> <p>6 Q Did you provide -- prepare such a list?</p> <p>7 A We all -- we constantly have a list.</p> <p>8 Q No --</p> <p>9 A But these were nonrenewals; these were not RIFs.</p> <p>10 Q It doesn't matter. Did you prepare a list for RIF?</p> <p>11 A We keep a list for RIF. We constantly -- we're 12 constantly updating it.</p> <p>13 Q Well, just a moment.</p> <p>14 Did you prepare, on instructions from the Board, a 15 list of the people to be considered for RIF?</p> <p>16 A No, because we wasn't looking at RIF then.</p> <p>17 Q Well, this document you have a dozen positions that 18 are called RIFs. Don't you? Let me go over them and 19 make sure, other than the ones we've covered.</p> <p>20 Page --</p> <p>21 A Are you looking at the RIF policy or what are you --</p> <p>22 Q I'm looking at the allocations.</p> <p>23 A Allocation?</p> <p>24 Q Yes.</p> <p>25 A It will say "RIF freeze," which means we're not</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEARSE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 A It does with the hiring of these individuals here.</p> <p>2 Q That's not included in your budget.</p> <p>3 A It's got to be in the budget somewhere on federal 4 money. Money is money, I mean.</p> <p>5 Q But Ms. Palmer -- you heard Ms. Palmer say it's not 6 included in this. Didn't you?</p> <p>7 A I think that's what she said.</p> <p>8 THE WITNESS: Isn't that what you said?</p> <p>9 MS. PALMER: It's in the projected budget 10 section --</p> <p>11 COURT REPORTER: I'm having trouble 12 hearing Mr. Walker.</p> <p>13 HEARING OFFICER: Mr. Walker, either move 14 your table this way some or -- or -- there you 15 go, maybe sit up. We're -- this wall is 16 blocking you.</p> <p>17 MR. WALKER: All right. I'll speak up.</p> <p>18 I'll speak up.</p> <p>19 HEARING OFFICER: Okay.</p> <p>20 BY MR. WALKER:</p> <p>21 Q On Page 7, there is another position here, I don't 22 know what it is, but it addresses Dr. Warren. And I 23 don't guess you feel that your -- it says -- I guess this 24 was anticipated. It says "new" and then "RIF" and then 25 "contract". What does that mean?</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 A I don't have that document in front of me. If I 2 could --</p> <p>3 Q Look on Page 7 of your document.</p> <p>4 A I don't have a document.</p> <p>5 Q Here you go. You've got it up there.</p> <p>6 A Oh, I do?</p> <p>7 Q Yeah.</p> <p>8 A I guess I have everything up here.</p> <p>9 Is that on the allocations?</p> <p>10 MS. SPRINGER: Yes.</p> <p>11 MR. WALKER: Yes.</p> <p>12 THE WITNESS: I don't see the allocations in this packet.</p> <p>13 MS. SPRINGER: Underneath that.</p> <p>14 THE WITNESS: Oh, under here?</p> <p>15 MS. SPRINGER: Right here.</p> <p>16 THE WITNESS: No. That's not allocations.</p> <p>17 If I could just take a quick look at what you have.</p> <p>18 MR. WALKER: Here, give him this one.</p> <p>19 BY MR. WALKER:</p> <p>20 Q Go to Dr. Warren. Now hers is the only one that says those three things, and it seems to give you the option --</p> <p>21 A What page are you looking at?</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 BY MR. WALKER:</p> <p>2 Q Page 8. And it says, this is position and titles, 3 it has Learning Services, then you had anticipated that 4 there were going to be some positions new, RIF, contract?</p> <p>5 HEARING OFFICER: Okay. Now, wait a 6 minute. It's important for the record, Page 8 7 says, Department Elementary Principal --</p> <p>8 MR. WALKER: That's right.</p> <p>9 HEARING OFFICER: -- recommended by Janice Warren?</p> <p>10 MR. WALKER: That's the one.</p> <p>11 HEARING OFFICER: Is that the page you're on?</p> <p>12 MR. WALKER: That's the page I'm on, but there are no recommendations.</p> <p>13 MR. BEQUETTE: Object to the relevance of this line of questioning.</p> <p>14 THE WITNESS: Let me -- can I explain it? Hopefully this will clarify it.</p> <p>15 MR. WALKER: No. Just a moment. Let me ask you --</p> <p>16 HEARING OFFICER: Well, Mr. Walker, what's the relevance?</p> <p>17 MR. WALKER: Beg your pardon?</p> <p>18 HEARING OFFICER: What's the relevance</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 Q Page 7, I think it is.</p> <p>2 It seems to give you the options to reduce her, 3 terminate her, or freeze her.</p> <p>4 Do you see Dr. Warren's allocation?</p> <p>5 A Department Specialty Programs, Learning Services, 6 recommended by John -- or Janice Warren, April 2nd.</p> <p>7 Q No, look at the one where Dr. Warren's position is, 8 and it says "RIF" at bottom?</p> <p>9 HEARING OFFICER: You-all need to show 10 each other what you're looking at what, because 11 what I'm --</p> <p>12 MS. GILLEN: I don't know what he's 13 talking about.</p> <p>14 HEARING OFFICER: We don't know what 15 you're talking about.</p> <p>16 THE WITNESS: Are you talking about 17 Dr. Warren's position?</p> <p>18 BY MR. WALKER:</p> <p>19 Q Yeah, that's right. Let me show you. See --</p> <p>20 A That's Page 4 -- 3.</p> <p>21 Q You said that's three -- that's 8.</p> <p>22 A That's Page 3.</p> <p>23 Q That's Page 8?</p> <p>24 HEARING OFFICER: So what page are you all 25 on?</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 here?</p> <p>2 MR. WALKER: The relevance here is to show 3 that they anticipated RIFs.</p> <p>4 THE WITNESS: Can I clarify?</p> <p>5 HEARING OFFICER: Then --</p> <p>6 MR. WALKER: And since RIFs were 7 anticipated, it is pretty clear that they 8 didn't follow the RIF policy or even consider 9 it.</p> <p>10 HEARING OFFICER: Okay. Let's let Mr. --</p> <p>11 THE WITNESS: Okay. If you look on Page 8 12 under position and title --</p> <p>13 HEARING OFFICER: -- Brewer explain.</p> <p>14 THE WITNESS: -- source of funding, salary 15 schedule range, and then it says, position, 16 new, RIF, contract length, classified, 17 transferred, no change, that's the reference 18 point of what we're actually going to put down 19 there as one of the --</p> <p>20 HEARING OFFICER: One of those, rather 21 those are your choices?</p> <p>22 THE WITNESS: That's right.</p> <p>23 And underneath there Dr. Warren has 24 recommended 13 -- 16 principals, an ABC 25 Pre-School Principal/Director; and Assistant</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018</p> <p>1 Principals, 10; funding change, the funding source is Teacher Salary, for the ABC person is the ABC Grant, and for the Assistant Principals is Teacher Salary. And it is --</p> <p>5 <b>HEARING OFFICER:</b> Okay. Let me ask you this: Where it says position, comment, are those all the possible choices?</p> <p>8 <b>THE WITNESS:</b> Yes.</p> <p>9 <b>HEARING OFFICER:</b> Okay. So --</p> <p>10 <b>THE WITNESS:</b> So if we were going to have RIFs or anything else over there, they would have been listed over there.</p> <p>13 <b>HEARING OFFICER:</b> They would have been circled or --or --</p> <p>15 <b>THE WITNESS:</b> It would have been listed, what positions --</p> <p>17 <b>HEARING OFFICER:</b> Okay. Those are just the options?</p> <p>19 <b>THE WITNESS:</b> Those are allocations, that's what we're going to hire, because every school has got to have a principal.</p> <p>22 <b>BY MR. WALKER:</b></p> <p>23 Q Now, let me ask you, Mr. Brewer, in your efforts to reduce staff, did you take action to maintain a racially balanced certified staff?</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018</p> <p>1 Page 135, No. 1?</p> <p>2 <b>HEARING OFFICER:</b> Okay. Mr. Walker, let me see if I can cut through some of this.</p> <p>4 Let me -- let me ask Mr. Brewer something.</p> <p>5 Mr. Brewer, is what you're saying is the Board directed you-all to look at Central Office staff and see what you could reduce?</p> <p>8 <b>THE WITNESS:</b> (Nodding head up and down.)</p> <p>9 <b>HEARING OFFICER:</b> And this was the result of your seeing what you could reduce?</p> <p>11 <b>THE WITNESS:</b> Yes.</p> <p>12 <b>HEARING OFFICER:</b> Not just these four people, but these four people plus --</p> <p>14 <b>THE WITNESS:</b> Plus myself, Danny Ebbs, John Tackett, Dr. Goodwin, who are all basically Caucasian.</p> <p>17 <b>HEARING OFFICER:</b> Okay. And so you're not looking at a district-wide RIF; you're looking at --</p> <p>20 <b>THE WITNESS:</b> Central Office.</p> <p>21 <b>HEARING OFFICER:</b> -- Central Office, how to reduce the staff in Central Office, per what the Board is wanting to do?</p> <p>24 <b>THE WITNESS:</b> Yes.</p> <p>25 <b>HEARING OFFICER:</b> Okay.</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018</p> <p>1 A <b>We always do that. Yes.</b></p> <p>2 Q Did you do it in these RIFs that affected these four people?</p> <p>4 A <b>We did.</b></p> <p>5 Q Isn't it true that the program administrators, these three, Beasley, Townsend, and Pride, worked at the elementary schools and they were the only program administrators?</p> <p>9 A <b>No. There was five.</b></p> <p>10 Q There were five?</p> <p>11 There were two, but were the two other program administrators in the elementary schools?</p> <p>13 A <b>Some were secondary, some were --</b></p> <p>14 Q How many were secondary?</p> <p>15 A <b>I don't know for sure.</b></p> <p>16 Q Two. And weren't these -- were not these persons in the elementary section, and you recommended that all of them in the elementary section be -- be eliminated?</p> <p>19 A <b>I recommended all of them be eliminated --</b></p> <p>20 Q Well, I understand.</p> <p>21 A <b>-- secondary and elementary.</b></p> <p>22 Q Well, how does that maintain a racially balanced certified staff, where you have an objective -- the Board has an objective that was required by the Board to seek to recruit and retain identifiable minorities -- that's</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEASLEY; NICOLE TOWNSEND, 06/11/2018</p> <p>1 <b>BY MR. WALKER:</b></p> <p>2 Q Well, Mr. Brewer, that's not true, is it? You didn't -- you didn't affect your own office, other than yourself. Did you?</p> <p>5 You didn't -- you have -- you have a number of people --</p> <p>7 A <b>We have -- we had one that we cut, but we're hoping to get it replaced back by Dr. McNulty.</b></p> <p>9 Q Just a minute.</p> <p>10 You have a number of employees who report through Ms. Burgess to you. Don't you?</p> <p>12 A <b>We have five --</b></p> <p>13 Q Yes or no?</p> <p>14 A <b>Okay. Ask -- ask your question --</b></p> <p>15 Q You have a number of persons who report to you in the personnel department. Don't you?</p> <p>17 A <b>All of them do.</b></p> <p>18 Q All right. And it's at these five. Isn't that correct?</p> <p>20 A <b>(Nodding head up and down.)</b></p> <p>21 <b>HEARING OFFICER:</b> Say yes or no,</p> <p>22 Mr. Brewer.</p> <p>23 <b>THE WITNESS:</b> Yes.</p> <p>24 <b>BY MR. WALKER:</b></p> <p>25 Q All right. And you didn't recommend -- you didn't</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BERSHADSKY NICOLE TOWNSEND, 06/11/2018</p> <p>1 recommend that any of them lose their jobs. Did you?      2 A I did.      3 Q Which one?      4 A Terri Williams.      5 Q All right. Terri Williams. Was he [sic] a      6 full-time employee?      7 A Yes.      8 Q She has been -- she has been out of your office for      9 a long time. Hasn't she?      10 A I'm well aware of that. The whole year.      11 Q Okay. So at the time, of the current employees who      12 are on a regular basis, you did not recommend that any of      13 them be cut. Did you?      14 A Of our staff?      15 Q Yes.      16 A We've cut two out in the last three years.      17 Q In -- in this particular --      18 A No.      19 I do hope to get to replace the one we did cut.      20 Q Now, you told this Board before -- do you recall, on      21 April 19th, you said all of these cuts were made in      22 consultation with Mr. John Tackett?      23 A No.      24 Q Dr. Tackett?      25 A No.</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BERSHADSKY NICOLE TOWNSEND, 06/11/2018</p> <p>1 MR. WALKER: And you know we made that      2 same objection with Mr. Kemp.      3 BY MR. WALKER:      4 Q Now, you -- you have a lot of people in Central      5 Office that you like?      6 A Not near as many as we used to have.      7 Q You have a couple of hundred. Don't you?      8 A No.      9 Q How many people are at the Central Office?      10 A I would guess right at 90 -- between 90 and 100.      11 Q All right. But now the core, the people who address      12 the educational component of the district are the program      13 administrators; aren't they?      14 A I would say to some degree it's everybody that works      15 in this office.      16 Q I understand, but the ones who have direct      17 responsibility for curriculum are the program      18 administrators. Isn't that correct?      19 A Yes. I would say that's not the only ones, but      20 those are certainly the major.      21 Q Those are the ones -- those are the ones you cut;      22 isn't that correct?      23 A It's the ones we recommended that their jobs be cut      24 so we can look at restructuring.      25 Q Now, look, of that group you have six people -- five</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BERSHADSKY NICOLE TOWNSEND, 06/11/2018</p> <p>1 Q And you said they were made in consultation with      2 Mr. Will Reid. Didn't you?      3 A They both discussed it with me. They had nothing to      4 do with the decision.      5 Q Here is what I recall you saying, and I listened      6 carefully. I went and I talked to them and we discussed      7 these cuts.      8 A I didn't go and talk to them. They came to my      9 office and asked if they could visit with me.      10 Q All right. So you went and consulted with them --      11 A No.      12 HEARING OFFICER: No, Mr. Walker.      13 THE WITNESS: No. They came to me after      14 the --      15 HEARING OFFICER: Mr. Walker, stop. Stop.      16 Mr. Walker, when you ask a question, let      17 Mr. Brewer finish his answer before you ask      18 your next question.      19 MR. WALKER: In all due respect, you don't      20 have to yell at me.      21 HEARING OFFICER: Do what?      22 MR. WALKER: In all due respect, you don't      23 have to yell at me.      24 HEARING OFFICER: I'm sorry. I couldn't      25 make myself heard.</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BERSHADSKY NICOLE TOWNSEND, 06/11/2018</p> <p>1 people?      2 A Five.      3 Q And it was -- it was a majority African-American.      4 Wasn't it?      5 A Three to two.      6 Q That's right.      7 MR. BEQUETTE: Objection. This is      8 repetitive --      9 BY MR. WALKER:      10 Q And in the district --      11 MR. BEQUETTE: -- and it's argumentative.      12 HEARING OFFICER: Okay. Mr. Walker, you      13 told me earlier at the beginning when I asked      14 you that you weren't complaining about these      15 people being selected for an impermissible      16 reason --      17 MR. WALKER: No.      18 HEARING OFFICER: -- but it was the      19 process that you were having a problem with.      20 MR. WALKER: No. No. I told you also      21 that they had commitments that weren't being      22 followed.      23 MR. BEQUETTE: Well, that's in the deseg      24 case.      25 HEARING OFFICER: Okay. Okay. Wait just</p>

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1 a minute. That would be a process issue.

2 **MR. WALKER:** Now, just a moment. We've  
3 got an exhibit before you. Part of the RIF  
4 policy that has been approved by the Board  
5 requires --

6 **HEARING OFFICER:** Okay. But he's just  
7 said, we've just talked about that this is not  
8 a RIF.

9 **MR. WALKER:** Well, he said it isn't but  
10 it's whatever he wants it to be.

11 **MR. BEQUETTE:** Well, at this point he's  
12 beating a dead horse.

13 **HEARING OFFICER:** Well, you can make that  
14 argument.

15 **MR. BEQUETTE:** I mean this is repetitive.

16 **HEARING OFFICER:** You can make that  
17 argument in your closing that it isn't what he  
18 says it is.

19 **MR. WALKER:** All right. Look, look, look,  
20 we've been on this --

21 **HEARING OFFICER:** I don't mean to -- I  
22 don't mean to shortcut you and I don't want to  
23 shortcut you, but I don't want to beat a dead  
24 horse either.

25 **MR. WALKER:** Well, tell me this -- if it's

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1 didn't know how much.

2 But let me ask the question.

3 **BY MR. WALKER:**

4 Q Did you have any standards that you followed before  
5 you took undertook this process?

6 **MR. BEQUETTE:** This has been asked and  
7 answered. This is repetitive.

8 **MR. WALKER:** Well, no, let -- you asked  
9 and answered to some degree --

10 **HEARING OFFICER:** Let Mr. Brewer state it  
11 again.

12 How did you decide on the people that you  
13 RIF'ed -- I mean, excuse me -- the people that  
14 you decided to put on this list.

15 **THE WITNESS:** We looked at positions --  
16 number one, we looked at positions that could  
17 be consolidated.

18 **HEARING OFFICER:** Okay. There is one  
19 criteria.

20 **THE WITNESS:** Yeah.

21 We also looked at jobs that maybe could be  
22 done in less time than a full year, that could  
23 be a substantial savings.

24 **HEARING OFFICER:** To reduce the amount of  
25 days on a contract?

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1 part of the RIF policy, if this is part of the  
2 RIF policy, you cannot go in and RIF people who  
3 are of a certain -- of a certain  
4 characteristic, that what you are seeking to  
5 have them maintain and increase, and -- and  
6 then say we don't have to follow this policy,  
7 our own policy, and it's in your policy manual.

8 **HEARING OFFICER:** So your objection to  
9 this tonight would be because it doesn't follow  
10 deseg, not because it didn't follow process?

11 **MR. WALKER:** Well, also remember, the  
12 policy -- the law requires that he cannot make  
13 decisions on an arbitrary basis.

14 **HEARING OFFICER:** Well --

15 **MR. WALKER:** Now, he's told you in no  
16 uncertain terms that his decisions were  
17 arbitrary.

18 **HEARING OFFICER:** Well, ask him what basis  
19 he did make it on.

20 **MR. WALKER:** I did. And he said -- first  
21 of all I asked, Ms. Streett, if he had any  
22 written standards and he said, no, it was then  
23 that he just came up with something. And then  
24 I asked him what were they and he couldn't --  
he just said, I need to cut some money, and

1 **THE WITNESS:** Days.

2 We consolidated a couple of directors  
3 positions into one position. I've already said  
4 that, haven't I?

5 We cut the CEO of the district back to an  
6 Assistant Superintendent, whoever that person  
7 might be. Okay? That's a substantial savings.

8 We cut the Director of Secondary  
9 Education. We cut the Director of Elementary  
10 Education, but we're reintroducing a Deputy  
11 Superintendent, which is still a substantial  
12 savings.

13 That was the criteria we used, along with  
14 Dr. McNulty, as to he wanted the chance to  
15 restructure how the curriculum and how these  
16 jobs that these ladies had could be  
17 restructured to fit more what he would want to  
18 have. He wanted a chance to come in,  
19 interview, and possibly hire all of them or  
20 part of them, along with whatever the Board  
21 would allow. That was my instructions.

22 I came back and presented that stuff here  
23 at the Board, and the Board accepted those  
24 recommendations.

25 **BY MR. WALKER:**

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1 Q Now, Will Reid had a department too there. Didn't  
2 he? Technology?  
3 A Does he have a department? Yes.  
4 Q Yes. In the Central Office?  
5 A Yes.  
6 Q And he has 20 or 30 employees or more. Isn't that  
7 correct?  
8 A Probably close to 20.  
9 Q Several of those people also give support to these  
10 three -- these three people. Don't they?  
11 A They should. I don't know if they do.  
12 Q All right. But those support staff have been  
13 retained by you, haven't they?  
14 A Support staff?  
15 Q Yes. The people who back them up in the schools,  
16 they were retained?  
17 A He didn't cut anybody this year, that I'm aware of.  
18 Q He didn't -- you left it up to Mr. Reid to determine  
19 who to cut?  
20 A No.  
21 Q So then why didn't you go to his department, since  
22 you were dealing with the Central Office?  
23 A Because he had already had cuts in his department  
24 the last three or four years.  
25 Q So -- so you were trying to balance this thing out

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1 developed and implemented before school starts?  
2 A I certainly think so, yes.  
3 Q All right. Isn't the normal path for people who  
4 work in their positions to be working on that now and  
5 through the summer and that's why they are 12-month  
6 employees?  
7 A That's correct.  
8 Q And they are now -- at least the students of the  
9 district won't be able to have them there as of July 1?  
10 A Probably not July 1. Possibly the week after.  
11 Q Possibly. But you have to then go through a posting  
12 procedure. Don't you?  
13 A Unless they are hired as interim.  
14 Q Oh, unless they are hired as interim, like you?  
15 A That's right.  
16 Q All right. But now, your district policy,  
17 Mr. Brewer, is to go ahead and post those positions,  
18 isn't it?  
19 MR. BEQUETTE: Objection. This is  
20 irrelevant.  
21 MR. WALKER: It is not irrelevant. We're  
22 showing basically how the district -- how  
23 the -- how the Board triggered elimination  
24 of -- of a role for persons where education  
25 would be diminished for no good cause.

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1 because some cuts that had been made in previous years  
2 and, basically, when the Board told you to cut, you took  
3 into account what you've already -- what had already been  
4 done and you were just trying to get around to this  
5 department because it had not been affected before?  
6 A That department had been affected before.  
7 Q Well then you're going and gutting it, because you  
8 got rid of all them?  
9 A Not gutting it. My idea was that I thought he was  
10 going to put some of them back.  
11 Q Okay. But as of now --  
12 A As of now they don't have a job.  
13 Q As of now it's all -- that department is the only  
14 one in your whole Central Office that's entirely gutted,  
15 isn't it?  
16 A It's not entirely gutted. We've still got people up  
17 there.  
18 Q The fact is --  
19 HEARING OFFICER: Let him answer. Let him  
20 answer.  
21 BY MR. WALKER:  
22 Q It was only program administrators who were removed;  
23 isn't that correct?  
24 A That's correct.  
25 Q Now, isn't it necessary for curriculum to be

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1 Now --  
2 HEARING OFFICER: Well, I think that's  
3 your argument, you can make that argument,  
4 Mr. Walker --  
5 MR. WALKER: Well, well --  
6 HEARING OFFICER: -- but I think he's  
7 given you some criteria that he used to choose  
8 these positions.  
9 MR. WALKER: He just came up with those.  
10 He first said he didn't have any.  
11 BY MR. WALKER:  
12 Q Now, my point, you didn't have any written criteria,  
13 did you, Mr. Brewer? Just say --  
14 A I hope I did not. I don't have one today.  
15 Q That's right. And whatever come to mind is what you  
16 said?  
17 A Whatever I -- whatever the direction of the Board  
18 and the new Superintendent, and along with Dr. Warren  
19 asked me to do, I can either do that or go to the house.  
20 Q But Dr. Warren didn't you give you any criteria.  
21 Did she?  
22 A Not on this subject, no.  
23 Q That's right.  
24 A On a lot of other subjects --  
25 HEARING OFFICER: Okay. Mr. Walker. I

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 think we've discussed that enough. Have you 2 got other questions?</p> <p>3 <b>MR. WALKER:</b> Yes.</p> <p>4 <b>HEARING OFFICER:</b> Okay.</p> <p>5 <b>BY MR. WALKER:</b></p> <p>6 Q Now, Mr. Brewer, do you recall telling me that you 7 have had individual conversations with some of the board 8 members?</p> <p>9 <b>HEARING OFFICER:</b> Mr. Walker, we can't 10 hear you. I'm sorry.</p> <p>11 <b>BY MR. WALKER:</b></p> <p>12 Q Do you recall informing me that you had had a 13 conversation with some of the board members?</p> <p>14 A No, I do not.</p> <p>15 Q Are you saying that you have never spoken with 16 Ms. Alicia Gillen about any of these subjects?</p> <p>17 A I am.</p> <p>18 Q Okay. And none of the other board members?</p> <p>19 A Not that I'm aware of individually. They talked to 20 me as a group about that.</p> <p>21 Q Where? Where?</p> <p>22 A Here.</p> <p>23 Q In a -- in a public board meeting?</p> <p>24 A Yes.</p> <p>25 Q Other than on April 19th?</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 there is something you can do?</p> <p>2 A I met with them. I can't say what per se --</p> <p>3 <b>THE WITNESS:</b> Can you hear me --</p> <p>4 <b>COURT REPORTER:</b> (Nodding head up and down.)</p> <p>5 <b>THE WITNESS:</b> I don't remember exactly what I said. I wanted them to know this was certainly no job performance recommendation, it wasn't anything against their job performance here, it was strictly a restructuring of a new Superintendent, and that's what they had a new opportunity to do. But I did tell them I certainly enjoyed working with them, I hoped that all of them had an opportunity to come back. But I'll certainly give them a recommendation where ever they wanted to apply and they need a recommendation.</p> <p>6 <b>BY MR. WALKER:</b></p> <p>7 Q Well, let me go ahead and ask you, did you discuss 8 Ms. Palmer's budget with her before you made the 9 recommended cuts?</p> <p>10 A No. I heard her make the recommendation. I heard 11 her make the presentation to the Board meeting.</p> <p>12 Q I see.</p> <p>13 But you didn't discuss --</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 A April 10th.</p> <p>2 Q April 10th?</p> <p>3 All right. And you do acknowledge that your 4 decisions were somewhat arbitrary?</p> <p>5 A Probably some. Not totally.</p> <p>6 Q I see.</p> <p>7 Do you understand that you cannot engage, in dealing 8 with employee decision making, you cannot engage in 9 arbitrary decision making?</p> <p>10 A Well --</p> <p>11 Q You understand that that's the law. Don't you?</p> <p>12 A I understand that's not. I understand not the way 13 you're asking.</p> <p>14 Q Okay. All right. Thank you.</p> <p>15 Let me go to the rest of my exhibits here.</p> <p>16 Did you -- did you tell the program administrators 17 that they could reapply for any position?</p> <p>18 A They could. Anybody can be apply for any position 19 that they are qualified -- that are certified in.</p> <p>20 Q Did you work with these persons in order to try to 21 get them other jobs?</p> <p>22 A They haven't asked me.</p> <p>23 Q Maybe they didn't ask but did you go to them and 24 say, we know you're important, we want to keep you, 25 Dr. McNulty may want to keep you, but we want to see if</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEQUETTE; NICOLE TOWNSEND, 06/11/2018</p> <p>1 A No.</p> <p>2 Q -- the budget?</p> <p>3 All right. Is it your testimony that McNulty told 4 you to non-renew these people? Yes or no?</p> <p>5 A Well, it's not a yes or no question.</p> <p>6 Q Did he tell you to non-renew these people?</p> <p>7 A He told me what he would like to do, and I said, in 8 order to do that, I made sure that he understood that if 9 I give these ladies a letter that says, your job is 10 non-renewed, that they are basically losing their job. 11 He said, I understand that, but what I would like to do 12 is have the opportunity to come and visit with them -- 13 and I think he did -- talk to them about possibly 14 rehiring them into a position similar to what they had 15 but maybe with a different structure.</p> <p>16 And I think I've answered that three or four times 17 already.</p> <p>18 Q All right. Let me ask you --</p> <p>19 A So it's not a yes or no. He didn't say, yeah, y'all 20 get rid of these people. It wasn't quite like that.</p> <p>21 Q Did you -- you indicated that he told you that -- to 22 see if some of the jobs could be consolidated?</p> <p>23 <b>MR. BEQUETTE:</b> Objection. This is ground 24 that's already been plowed.</p> <p>25 <b>MR. WALKER:</b> I have not finished my</p>

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<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 question.  <b>2 BY MR. WALKER:</b>  <b>3 Q</b> Which jobs did you determine could be consolidated?  <b>4 MR. BEQUETTE:</b> Same objection.  <b>5 THE WITNESS:</b> The Elementary Director and  <b>6</b> the Deputy Superintendent. You can eliminate  <b>7</b> one of those because both of them have about --  <b>8</b> approximately, the same job description.  <b>9 BY MR. WALKER:</b>  <b>10 Q</b> Well, among the people, these program  <b>11</b> administrators, have any of those jobs been consolidated?  <b>12 A</b> Well, I don't know. I haven't looked at the --  <b>13</b> talking about their job --  <b>14 Q</b> Yes.  <b>15 A</b> -- being eliminated? Possibly they could be part of  <b>16</b> the restructure they he has in mind.  <b>17 Q</b> Do you know what these people actually did,  <b>18</b> Mr. Brewer?  <b>19 A</b> Not day to day. I mean, I kind of knew their  <b>20</b> responsibilities.  <b>21 MR. WALKER:</b> Thank you.  <b>22 THE WITNESS:</b> You're welcome.  <b>23 MR. BEQUETTE:</b> No further questions.  <b>24 HEARING OFFICER:</b> Any --  <b>25 MR. BEQUETTE:</b> That concludes the</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 <b>MR. WALKER:</b> I didn't understand you.  <b>2 HEARING OFFICER:</b> Is this just -- I mean,  <b>3</b> have you got a witness?  <b>4 MR. WALKER:</b> I mean, I --  <b>5 HEARING OFFICER:</b> Other than her?  <b>6 MR. WALKER:</b> I have a -- I have the  <b>7</b> documents and they are -- they are before the  <b>8</b> Board.  <b>9 HEARING OFFICER:</b> Okay. Do you want to  <b>10</b> tell us which documents we should look at?  <b>11 MR. WALKER:</b> Well, he --  <b>12 MR. BEQUETTE:</b> This sounds like argument.  <b>13 HEARING OFFICER:</b> I think it is, but he  <b>14</b> says he's got an exhibit so I think he can  <b>15</b> point out the exhibits.  <b>16 MR. WALKER:</b> I don't know how the exhibits  <b>17</b> can sound like arguing, Mr. Bequette.  <b>18 MR. BEQUETTE:</b> Well, the argument --  <b>19 HEARING OFFICER:</b> That --  <b>20 MR. WALKER:</b> The exhibit here is Exhibit  <b>21</b> 5 -- Exhibit 5.  <b>22 HEARING OFFICER:</b> Okay. Mr. Walker, if  <b>23</b> you've got -- No. 5?  <b>24 MR. WALKER:</b> Yes.  <b>25 HEARING OFFICER:</b> Okay. Anything else?</p>
<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 district's presentation.  <b>2 HEARING OFFICER:</b> Mr. Walker, do you have  <b>3</b> any witnesses?  <b>4 MR. WALKER:</b> Yes. Ms. Gillen.  <b>5 HEARING OFFICER:</b> We're not calling --  <b>6 MR. BEQUETTE:</b> We object to calling the  <b>7</b> board members, any board members as witnesses.  <b>8 HEARING OFFICER:</b> We're not going to call  <b>9</b> a board member.  <b>10 MR. WALKER:</b> If we could call Ms. Gillen  <b>11</b> we would proffer that she was involved in the  <b>12</b> beginning in August, in September, she was  <b>13</b> involved with the Maumelle Chamber of Commerce.  <b>14 MS. GILLEN:</b> Is there an objection  <b>15</b> standing?  <b>16 HEARING OFFICER:</b> Mr. Walker, the way a  <b>17</b> proffer works is you can make that after the  <b>18</b> meeting and you can put it in writing and we'll  <b>19</b> put it in.  <b>20</b> Have -- I need to -- I also need to look  <b>21</b> at the Board rules to see if a proffer is even  <b>22</b> appropriate for a board meeting, I'm not  <b>23</b> familiar with any rule.  <b>24</b> Can you call a witness that is going to  <b>25</b> say what you want to put in from her?</p>	<p>PCSSD v KIFFANY PRIDE; LAURA SHIRLEY; JENNIFER BEAUGHEY NICOLE TOWNSEND, 06/11/2018</p> <p>1 <b>MR. WALKER:</b> Since you are not allowing me  <b>2</b> to call her at this time and I -- I'll call  <b>3</b> Dr. Warren.  <b>4</b> No, instead of Dr. Warren, Ms. --  <b>5</b> Dr. Goodwin. I'm sorry.  <b>6 EXAMINATION OF DR. LINDA GOODWIN</b>  <b>7 BY MR. WALKER:</b>  <b>8 Q</b> State your name, please.  <b>9 A</b> Linda Goodwin.  <b>10 Q</b> Ms. Goodwin, are you employed by the Pulaski County  <b>11</b> Special School District?  <b>12 A</b> Yes, sir.  <b>13 Q</b> What is your capacity?  <b>14 A</b> Interim Director of Elementary Education.  <b>15 Q</b> Were you serving in that position during the month  <b>16</b> of April of this year?  <b>17 A</b> Yes, sir.  <b>18 Q</b> Did you -- did Dr. -- did Mr. Brewer ever come to  <b>19</b> you to discuss budget reductions with you --  <b>20 A</b> No, sir.  <b>21 Q</b> -- regarding the people in your --  <b>22 A</b> No, sir.  <b>23 Q</b> Were these program administrators -- look at the  <b>24</b> Board. Were these program administrators working under  <b>25</b> your supervision?</p>